

165157

ORIGINAL
(Reg)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Request for Additional Funding for CERCLA Removal
Action at Thompson Street Trailer Site,
Philadelphia, Philadelphia County, Pennsylvania **DATE:** OCT 03 1988

FROM: James Seif *James Seif*
Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste Emergency Response (WH-562-A)

ISSUE

The attached CERCLA Additional Funding Request pertains to the Thompson Street Trailer Site, located at 4100 East Thompson Street, Philadelphia, Philadelphia County, Pennsylvania.

An assessment performed in accordance with the National Contingency Plan by my staff, City of Philadelphia and State personnel has identified the existence of a threat to human health and the environment due to the presence of hazardous substances in drums stored in three semi-trailers located in a residential community. Of immediate concern is the potential for fire and explosion from drums containing flammable materials. Immediate removal, proper staging, and disposal of the drums would eliminate the threat. Such action would be appropriate and consistent with any later remedial work that may need to be conducted.

This request is pursuant to the Delegation of Authority 14-1-A (4/16/84), amended by Section 104(e) of Superfund Amendments and Reauthorization Act (SARA) of 1986, which authorizes the Regional Administrator to approve CERCLA Removal Actions with a total cost of less than \$2,000,000. For this reason, I have approved an additional \$628,800 of which \$470,000 is extramural costs to remove the drums from the trailers, and properly segregate, characterize, stage, and dispose of the hazardous substances currently posing a threat to human health and the environment. On September 30, 1988, the OSC utilized his Delegation of Authority 14-1-A (5/1/85) to appropriate \$50,000 to begin the removal action, therefore the current ceiling allocated to this site is \$50,000. These additional funds will bring the total ceiling to 678,800, of which \$505,000 is for extramural cleanup contractor costs.

Attachments

AR300004

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Request for Additional Funding at the Thompson
Street Trailer Site, Philadelphia,
SUBJECT: Philadelphia County, Pennsylvania

DATE: OCT 03 1988

FROM: Lisa Marie Price, On-Scene Coordinator *LMP*
Emergency Response and Preparedness Section (3HW22)

TO: James M. Seif
Regional Administrator (3RA00)

THRU: Stephen R. Wassersug, Director *S. Wassersug*
Hazardous Waste Management Division (3HW00)

I. PURPOSE

This is a request for additional funds to mitigate the threat to human health and the environment posed by the presence of drums stored in three semi-trailers. The threat of fire and explosion exists due to possible high concentrations of organic vapors and the possibility that incompatible substances have been stored improperly. Some of the drums are in very poor condition and the threat that a violent reaction and/or a release may occur is substantial. The location of the site is in a heavily populated metropolitan neighborhood and is adjacent to two major highways (I-95 and Betsy Ross Bridge). The location of the site adds to the urgency of the situation and reinforces that the threats must be mitigated immediately.

Additional funds in the amount of \$678,800 will be utilized to remove the drums from the trailers, overpack drums in poor condition, stage and dispose of the drums. The OSC utilized his Delegation of Authority 14-1-A (5/1/85) on September 30, 1988 to begin the removal action. Therefore, these monies will be in addition to the \$50,000 that have already been obligated to this site.

AR300005

II. BACKGROUND

ORIGINAL
(Red)

A. Site Setting and Nature of the Incident

The Thompson Street Trailer Site is located in an industrial, commercial and residential setting in northeastern Philadelphia, PA. The site is in close proximity (within 100 yards) to Interstate 95 and the Betsy Ross Access Route.

On September 28, 1988, U.S. EPA ERPS and Technical Assistance Team (TAT) responded to an emergency situation received by the Regional Response Center (RRC). The RRC was notified by the Pennsylvania Department of Environmental Resources (PADER) of five semi-trailers parked on the 4100 Block of East Thompson Street, Philadelphia, Philadelphia County, Pennsylvania. Upon arrival, EPA and TAT were briefed by representatives of the City of Philadelphia Industrial Waste and PADER. During an initial inspection of the site, five semi-trailers were found backed against a loading dock. The trailers were in poor condition. Three of them had holes in the sides, no roofs and one appeared to have been involved in a fire. No evidence of materials leaking from the trailers was observed. The other trailers were open and neither contained drums. One trailer contained a small quantity of tires and the other appeared to be completely filled with wooden pallets.

The OSC contacted the property owner to request that he come to the site and discuss the situation. The owner declined the OSC request and stated that he did not know who owned the trailers. The OSC discussed the situation with City of Philadelphia Industrial Waste representatives who stated that it was still a city lead project and that they would contact the owner of the property in an effort to get the site secured. The City established a deadline of Friday, 9/30/88 at 0900 hours for the PRP to respond to the request to secure the site. The City stated that if the PRP did not make his intentions known by the deadline, they would request the EPA's assistance in order to control and stabilize the site.

On September 30, 1988 City of Philadelphia and PADER requested EPA's assistance in this matter. Access was obtained from the owner to the property and the trailers. EPA/ERPS and TAT conducted an emergency assessment and found approximately 350 drums (55 gallon) in fair to poor condition. Some of the drums were leaking and air monitoring instruments indicated moderate levels of organic vapors within the trailers. The entire contents of three of the five trailers were unknown due to the fact that the trailers were full and the drums were stacked double height. However, flammable liquid labels were observed on several of the drums.

AR300006

II. BACKGROUND (Continued)

B. Quantities and Types of Substances Present

During the initial assessment, approximately 350 drums of questionable integrity, and unknown contents were found stacked in three semi-trailers. To date it has been determined that caustics, flammable liquids, solvents (ie. MEK, Oakite), and numerous paint chemicals have been stored in the one semi-trailer. The contents of the other two trailers are unknown at this time. It is imperative that site stabilization and removal actions continue to eliminate the threats posed by this site.

III. THREAT

The Thompson Street Trailer Site meets the criteria for a Removal Action under NCP Section 300.65 in that there is a threat to public health, welfare and/or the environment. The NCP Removal Criterion (Section 300.65) that pertains to this site are as follows:

- 300.65(b)[2vi]- "Threat of fire or explosion."
"Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain."
- 300.65(b)[2vii]- "The availability of other appropriate Federal or State response mechanisms to respond to the release."

The threat of fire, explosion and/or a release due to the potential high concentrations of organic vapors and the evidence that incompatible substances have been stored improperly. Some of the drums are in very poor condition and the potential threat that a violent reaction may occur is substantial. The trailers in which the drums were stored are in very poor condition (ie. no roofs and holes in the sides of the trailers). One appears to have been involved in a fire. This threat is further substantiated by a fire that occurred at approximately 1615 hours on 10/02/88 near the site. The fire was apparently set to an abandoned car approximately 300 yards from site operations.

IV. ENFORCEMENT

Refer to attached Confidential Enforcement Status.

V. PROPOSED PROJECT AND COSTS

ORIGINAL
(Red)

The requested funds will be used to mitigate the fire and explosion threat and to provide a permanent solution to the problem. The proposed scope of work is illustrated in the following phases of the Removal Actions:

Phase 1. Secure, stabilize and overpack drums.

Phase 2. Sample and analyses

Phase 3. Transportation and disposal

Due to the currently undefined nature of the site, the estimation of project costs is based on information available to date is calculated at \$ 678,800. The proposed cost breakdown is as follows:

	Current Ceiling	Additional Funds
MINI-ERCS	\$35,000	\$470,000
TAT	10,000	\$ 42,000
Subtotal Extramural Costs	<u>\$45,000</u>	<u>\$512,000</u>
Project Contingency (15%)	----	\$ 76,800
Total Extramural Costs	<u>\$45,000</u>	<u>\$588,800</u>
EPA (Direct)	5,000	\$ 10,000
EPA (Indirect)	----	\$ 30,000
Total Intramural Costs	<u>5,000</u>	<u>\$ 40,000</u>
Total Project Ceiling	<u>\$50,000</u>	<u>\$628,800</u>

Proposed ceiling

Mini ERCS	\$505,000
TAT	\$ 52,000
Subtotal	\$557,000
15% Contingency	\$ 76,800
Total Extramural	\$633,800
EPA (Direct)	\$ 15,000
EPA (Indirect)	\$ 30,000
Total Intramural	\$ 45,000
Total Project Ceiling	\$678,800

ORIGINAL
(P/C)

VI. CONTRIBUTE TO REMEDIAL PERFORMANCE

The proposed removal action addresses the protection of public health and the environment by mitigating the fire and explosion threat, as well as direct human contact threat with hazardous substances. The OSC intends that all actions will be consistent with long term remedial actions.

VII. REGIONAL RECOMMENDATION

Because conditions at the Thompson Street Trailer Site continue to meet the criteria set forth in the National Contingency Plan, Section 300.65 for a Removal, I recommend your approval of this Funding Increase Request. Your approval of this request would raise the total project ceiling from \$50,000 to \$678,800. You may indicate your approval or disapproval by signing below.

APPROVAL

SPR James Acting RA

DATE

10/3/88

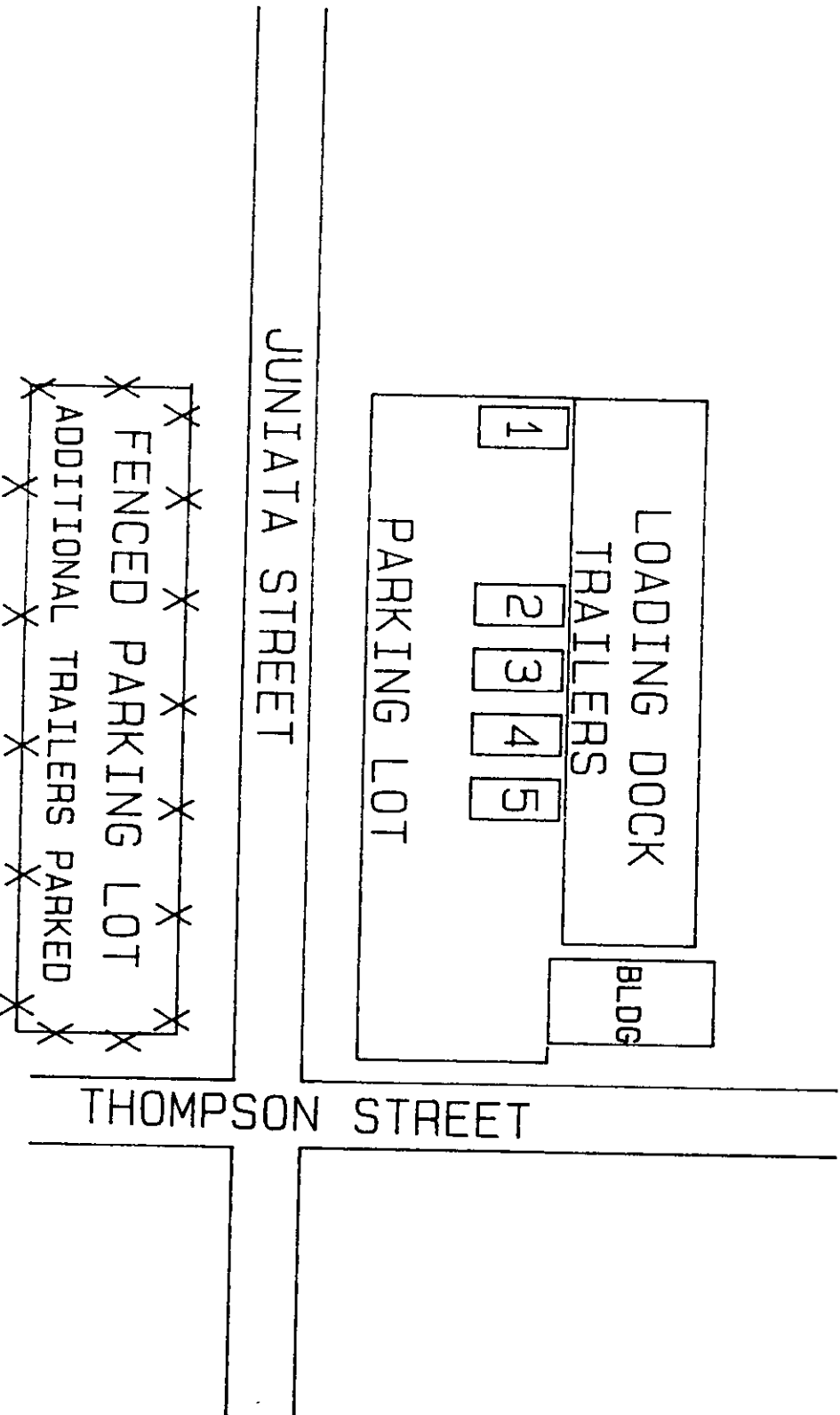
DISAPPROVAL

DATE

ORIGINAL
(Red)

THOMPSON STREET TRAILER SITE
PHILADELPHIA, PA

SKETCH NOT TO SCALE



AR300010